

From: [Shawn Ghose](#)
To: jean.mescher@mckesson.com
Subject: Fw: Final Version of the Third Five Year Review for Arkwood
Date: 06/21/2011 05:19 PM

----- Forwarded by Shawn Ghose/R6/USEPA/US on 06/21/2011 05:41 PM -----

RE: Final Version of the Third Five Year Review for Arkwood

Kilburn, to: Shawn Ghose,
Dianna

05/31/2011
02:19 PM

Cc:

Jean : Please delete this after reading. I want to know what Dianna is asking for?

Dear Mr. Ghose,

The risk based screening levels for PCP, benzo(a) pyrene, and dioxin have been updated several times since the ROD was finalized. Part of any CERCLA 5 year review is to evaluate the remedy relative to the current standards. A change to the remedy is not implied by this comparison, but an evaluation of the remedy in light of updated risk based standards is necessary. This evaluation should include why the present remedy is still protective and changes are not needed.

ADEQ comments were not in reference to the proposed changes for dioxin, but to the current (December 2010) values at the time of the 5 year review. The evaluation relative to currently protective levels is necessary.

Sincerely,
Dianna Kilburn

From: Ghose.Shawn@epamail.epa.gov [mailto:Ghose.Shawn@epamail.epa.gov]
Sent: Tuesday, May 31, 2011 1:45 PM
To: Egan, Marilyn; Kilburn, Dianna
Cc: Sanchez.Carlos@epamail.epa.gov
Subject: Final Version of the Third Five Year Review for Arkwood

Dear Ms Eagan/Kilburn: Most of the comments by ADEQ on the Third Five Year Review for the Arkwood Site has been incorporated to the maximum extent possible, in the latest version. The comments were numerous and would not be enumerated. However regarding industrial standards adopted at the time of the ROD, the change to new standards have not been adopted. The new standards will not start from Regional Screening values. The most important driver for the new standards would be driven by 2,3,7,8 TCDD. The Region was instructed by EPA HQ to put in the following statement:

The clean-up levels for PCP, c-PNAs and dioxin have not changed. EPA's dioxin reassessment has been developed and undergone review over many years with the participation of scientific experts in EPA and other federal agencies, as well as scientific experts in the private sector and academia. The Agency followed current cancer guidelines and incorporated the latest data and physiological/biochemical research into the assessment. The results of the assessment have currently not been finalized or adopted into state or federal standards. In addition, EPA/OSWER has proposed to revise the interim preliminary remediation goals (PRGs) for dioxin and dioxin-like compounds based on technical assessment of scientific and environmental data. However, EPA has not made any final decisions on interim PRGs at this time. Therefore, the dioxin toxicity reassessment for this Site will be updated during the next Five Year Review.

Sincerely

Shawn Ghose M.S., P.E., ASME
RPM Arkwood Superfund Site